

and/or contaminated. Ex. B ¶ 49. Plaintiffs were not required to plead with specificity because New Jersey is a notice-pleading state.

WHEREFORE, Plaintiffs, Greta Normand and Drew Normand, respectfully request this Honorable Court to grant Plaintiffs' Motion to Remand to the Superior Court, Law Division, of Cumberland County, as well as to grant recovery of the costs and attorneys' fees incurred in filing this Motion to Remand, including reasonable attorneys' fees in preparation of this Motion, and filing fees, as permitted by 28 U.S.C. § 1447(c).

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DATED: February 14, 2013

question of state law to be decided by a New Jersey court. Plaintiffs' Amended Complaint alleges that these defendants violated the community standard of care and that these defendants knew or should have known that the methylprednisolone acetate was defective and/or contaminated. Ex. B ¶ 49. Plaintiffs were not required to plead with specificity because New Jersey is a notice-pleading state.

For all of the aforementioned reasons, Plaintiffs, Greta Normand and Drew Normand, respectfully request this Honorable Court to grant Plaintiffs' Motion to Remand to the Superior Court, Law Division, of Cumberland County, as well as to grant recovery of the costs and attorneys' fees incurred in filing this Motion to Remand, including reasonable attorneys' fees in preparation of this Motion, and filing fees, as permitted by 28 U.S.C. § 1447(c).

Respectfully submitted,

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